

Simpson County School District

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December 2, 2014

Received & inspected

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

DEC - 8 2014

DOCKET FILE COPY ORIGINAL FCC Mail Room

Dear Sir/Madame,

I am writing today in response to FCC Chairman Tom Wheeler's recently announced proposal to raise the E-Rate funding cap by \$1.5 billion. The E-Rate program currently represents the only source of federal funding aimed at educational technology and is critical in providing discounts to assist schools (like mine) to obtain affordable telecommunications and internet access. As E-Rate Consultant for the Simpson County School District serving the rural areas of Magee, Mendenhall, and Pinola I strongly support the additional funding, am concerned with the phase out of voice service discounts, and urge you to consider the impact on school districts serving rural areas with limited funding.

Prior to my recent retirement I submitted E-Rate applications for the school district since the inception of the E-Rate program eighteen years ago. I must admit that the first days of the program were challenging as USAC personnel and local district personnel worked through the process. It didn't take long, however, before the impact of the program became evident to everyone involved. The first tenuous steps into the program introduced us to the wonders of dial-up and the opportunities to be afforded our students. Well, it didn't take long until we were ready to move forward, and, with the funding afforded through E-Rate, we (district personnel and community volunteers) pulled wire, crimped with RJ45 connectors, and even terminated at hubs. And, it worked. We were so proud of our networks. A computer was in each classroom for student use. Students were amazed, as were we, at how much broader instruction could be with the use of Internet resources. Time moved on. Students needed more than one computer per classroom. One drop was not sufficient. Hubs slowed down the network. We progressed with managed networks including switches, multiple drops, and quality networks affording our students a depth instruction through increased access of information. How was this funded? Through E-Rate. A small, rural district with high free/reduced rate population limited by state and federal funding would not have been afforded these opportunities for our students without E-Rate.

As the district eagerly anticipates expanding broadband and Wi-Fi opportunities we are also confronted by the loss of funding for voice services which will mean that funding for telephone services will have to be redirected from other areas. What are some of the necessities of school districts? Districts must have appropriate buildings, heating/cooling, staffing, and, telephone

service. It is not negotiable. Districts must be available. Therefore, please reconsider funding the voice. An outstanding network that would be highly praised throughout the world can be

Achieving Excellence In Education
Glenn D. Harris, Superintendent

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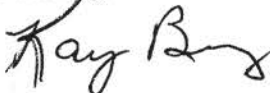
established, but, if no funding is available, or has been redirected, very limited devices might be available for students on the network.

The bottom line is that if funding for necessary voice services are ceased the school districts must find funds to pay for the services while also trying to find funding to pay for the E-Rate match for other services which are desired, but, not necessary immediately. This will place a larger burden on school districts in times of limited funding. No one questions that it is time to ensure that our libraries and schools are connected with the quality of connectivity that is sufficient and scalable for today's ever-growing connectivity needs. What should be addressed is the gap between available funding of richer and poorer school districts and the realistic expectations of the poorer school districts.

I commend the FCC for revising the definition of 'rural' as used within the E-Rate program. In July, the FCC adopted a new definition of the 'rural'. I am deeply concerned with the new definition and urge the FCC to modify the definition of rural as used in the E-Rate program. In particular, I am opposed to the use of 'urban clusters' to define rural without a population threshold, as the term inappropriately captures more than 1,500 rural schools and public libraries in the broad category of 'urban cluster,' denying them the additional rural E-rate discount for which they should qualify. I am concerned that the FCC has adopted a specific definition of rural for that will come with unintended consequences. The adopted definition works counter to the stated goal of helping close the connectivity gap, by potentially exacerbating the gap that exists between rural and non-rural areas. Loss of the critical 'rural' discount widens the affordability gap that many rural schools and libraries struggle with daily. I urge the FCC to modify its definition so that a population of 25,000 or greater be considered urban. This proposal recognizes the FCC's interest in modernizing the E-Rate rural definition in a census-centric manner while allowing schools and libraries in urban clusters with populations below 25,000 to be considered rural for the purposes of the E-Rate program.

Thank you for considering my request to reconsider continued eligibility of voice services as you move forward with your decision on the E-Rate program and its funding. I applaud the opportunities that have been afforded through the E-Rate program.

Sincerely,



Kay Berry, Ph.D.

E-Rate Consultant

Simpson County School District

Mississippi

Achieving Excellence In Education

Glenn D. Harris, Superintendent